

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA,  
NORTHERN DIVISION**

**HAZEL M. ROBY, as Administratrix of  
the Estate of RONALD TYRONE  
ROBY, Deceased,**

**Plaintiff,**

**V.**

**BENTON EXPRESS, INC., et al,**

**Defendants.**

**CIVIL ACTION NO.: 2:05CV494-T**

## MOTION FOR EXTENSION OF DEADLINES FOR ACCIDENT RECONSTRUCTION EXPERTS

COMES NOW the Defendant, Benton Express, Inc., and hereby moves the Court to extend the parties' deadlines for disclosure of accident reconstruction experts. In support thereof, Defendant states as follows:

1. This motion is unopposed by the Plaintiff's counsel.
2. The original expert disclosure deadline for the Plaintiff was September 30, 2005.

The Plaintiff provided a full disclosure of opinions on that date of a DOT expert, Roland Brown, and identified an accident reconstruction expert, M.P. Stirling.

3. Defendant had some objections to the expert disclosures as they pertained to the opinions of M.P. Stirling. Accordingly, Defendant requested that the Plaintiff amend and supplement said disclosures.

4. The parties have worked diligently and in good faith to resolve the objections regarding the expert disclosure of M.P. Stirling. As a result of that work, the parties have entered into the “Joint Stipulation Regarding Disclosure Deadlines for Accident Reconstruction

Experts” that is attached hereto as Exhibit “A.”

5. As noted in Exhibit “A,” the parties have agreed that the Plaintiff’s deadline for disclosure of an accident reconstruction expert should be October 31, 2005, and Defendant’s deadline should be November 30, 2005.

WHEREFORE, PREMISES CONSIDERED, Defendant respectfully requests the Court to enter an Order extending the parties’ deadlines for disclosure of accident reconstruction experts as outlined in this Motion and in Exhibit “A.”

Respectfully submitted,

s/ Gregory A. Brockwell  
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**CERTIFICATE OF SERVICE**

I hereby certify that I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following on this the 21st day of October, 2005:

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